

The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JASON WILLIAM SADLER,
Defendant.

CASE NO. MJ18-099

COMPLAINT for VIOLATION
18 U.S.C. §§ 922(g)(1)

BEFORE Chief United States Magistrate Judge Brian A. Tsuchida, United States
Courthouse, Seattle, Washington.

The undersigned complainant, Angelo Salcepuedes, Special Agent, Bureau of
Tobacco, Firearms, and Explosives, being duly sworn states:

COUNT ONE

(Felon in Possession of a Firearm)

On or about February 25, 2017, in the City of Seattle, within the Western District
of Washington, JASON WILLIAM SADLER, having been convicted of the following
crimes punishable by imprisonment for a term exceeding one year, to wit:

- a) *Possession of Heroin with Intent to Distribute, Possession of Cocaine with
Intent to Distribute, Use and Carry a Firearm During a Crime of Drug
Trafficking, and Felon in Possession of a Firearm*, in United States District
Court for the Western District of Washington, under cause number 03-CR-002,
dated on or about October 15, 2004;

- 1 b) *Unlawful Possession of a Firearm in the First Degree*, in King County
2 Superior Court, Washington, under cause number 98-1-03523-1, dated on or
3 about November 20, 1998; and
4 c) *Kidnapping in the Second Degree*, in King County Superior Court,
5 Washington, under cause number 98-1-03525-7, dated on or about November
6 20, 1998;

7 did knowingly possess, in and affecting interstate and foreign commerce, the following
8 firearm, to wit: a Springfield XDm, 9mm caliber pistol, serial number MG854418, which
9 had been shipped and transported in interstate and foreign commerce.

10 All in violation of Title 18, United States Code, Section 922(g)(1).

11 **COUNT TWO**

12 **(Felon in Possession of Ammunition)**

13 On or about February 25, 2017, in the City of Seattle, within the Western District
14 of Washington, JASON WILLIAM SADLER, having been convicted of the following
15 crimes punishable by imprisonment for a term exceeding one year, to wit:

- 16 a) *Possession of Heroin with Intent to Distribute, Possession of Cocaine with*
17 *Intent to Distribute, Use and Carry a Firearm During a Crime of Drug*
18 *Trafficking, and Felon in Possession of a Firearm*, in United States District
19 Court for the Western District of Washington, under cause number 03-CR-
20 002, dated on or about October 15, 2004;
21 b) *Unlawful Possession of a Firearm in the First Degree*, in King County
22 Superior Court, Washington, under cause number 98-1-03523-1, dated on
23 or about November 20, 1998; and
24 c) *Kidnapping in the Second Degree*, in King County Superior Court,
25 Washington, under cause number 98-1-03525-7, dated on or about
26 November 20, 1998;

27 did knowingly possess, in and affecting interstate and foreign commerce, the following
28 ammunition, to wit: one 9mm caliber cartridge with a headstamp of “• SPEER • 9mm
LUGER,” which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

1 **The undersigned complainant, Angelo Salcepuedes, being duly sworn states:**

2 1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms,
3 and Explosives (ATF) since March 2015 and currently assigned to the ATF Violent
4 Crime Task Force in Seattle, Washington.

5 2. I received a Bachelor of Science degree in Criminal Justice from the
6 University of Guam in Mangilao, Guam. I am an investigative or law enforcement officer
7 of the United States within the meaning of Title 18, United States Code, Section 2510(7),
8 that is, and officer of the United States who is empowered by law to conduct
9 investigations of, and to make arrest for, offenses enumerated in Title 18, United States
10 Code, Section 2516.

11 3. I received training at the Federal Law Enforcement Training Center in
12 Glynco, Georgia. While there, I completed the Criminal Investigator Training Program
13 which provided me knowledge of basic criminal investigations, including systematic
14 techniques for processing crime scenes, interviewing witnesses, gathering evidence, and
15 conducting surveillance. Additionally, I have completed the ATF Special Agent Basic
16 Training program at Glynco, Georgia, which included extensive training on firearms and
17 ammunition identification, firearms trafficking, alcohol and tobacco diversion
18 investigations, explosives and arson investigations, and undercover operations.

19 4. The statements contained in this affidavit are based on my own
20 investigation, my review of relevant documents, and my training and experience as a law
21 enforcement agent, as well as information provided to me by or through other law
22 enforcement agents, investigators, and individuals with knowledge of this matter. This
23 affidavit is intended to show that there is sufficient probable cause that the defendant
24 committed the offenses charged above, but does not include each and every detail known
25 by your affiant regarding this investigation.

26 //

27 //

28 //

Stolen Vehicle Recovered on February 25, 2017

5. On February 25, 2017, at approximately 1027 hours, King County Sheriff's Office (KCSO) deputies responded to a call regarding a black Mitsubishi with Washington license plate AYU9147 parked off the roadway at the 8500 block and 119 Avenue South area in Seattle, Washington. Dispatch advised officers that a man was sleeping inside the vehicle and that the vehicle had been reported stolen with the Portland Police Department (Portland PD case 17-55289).

6. Officers knocked on the window of the stolen car and woke up the man, later identified as JASON WILLIAM SADLER, who was seated in the driver's seat and was the only person in the vehicle. The deputies took SADLER into custody. During a search incident to arrest, deputies located a loose 9mm caliber round of ammunition in SADLER's right jeans pocket. Officers asked, "there's a bullet in your pocket, do you have a gun?" SADLER replied "No."

7. The car was confirmed to be a stolen vehicle and found to be an unreturned rental car with Budget Rental. The reporting party of the stolen vehicle authorized a search of the vehicle. Deputies located a Springfield XD 9mm caliber pistol bearing serial number MG854418 with a loaded magazine in the passenger seat. The firearm was found within arm's reach of where SADLER had been sitting.

8. The firearm was found to be stolen out of Snohomish County Sheriff's Office (SCSO case 2017-11035). Deputies also recovered four 9mm caliber rounds of ammunition that were in the cup holder between the front seats.

9. The deputies determined that SADLER had multiple outstanding misdemeanor warrants with the City of Kent and was listed as being a convicted felon.

10. At approximately 1102 hours, Officers read SADLER his constitutional rights, which he stated he understood. SADLER declined to make any statements.

11. Deputies took photographs of the vehicle, SADLER, and the stolen firearm. The vehicle was later towed and impounded. All evidence items were processed and taken into KCSO custody.

12. On April 11, 2017, officers conducted a follow up with G.S., the owner of the stolen Springfield XD pistol. G.S. told officers his home had been burglarized while out of town sometime during January 13, 2017 through January 23, 2017. Several items were taken to include a 9mm Springfield XD semi-automatic pistol with serial number MG854418. G.S. had reported the incident to the Snohomish County Sheriff's Office (SCSO case 2017-11035). G.S. told officers that he had never given SADLER permission to take or be in possession of his gun and will assist in prosecution.

SADLER' Criminal History

13. Prior to February 25, 2017, SADLER had been convicted of at least the following crimes punishable by a term of imprisonment exceeding one year:

- a) *Possession of Heroin with Intent to Distribute, Possession of Cocaine with Intent to Distribute, Using and Carrying a Firearm During a Drug Trafficking Crime, and Felon in Possession of a Firearm*, in United States District Court for the Western District of Washington, under cause number 03-CR-002, dated on or about October 15, 2004;
- b) *Unlawful Possession of a Firearm in the First Degree*, in King County Superior Court, Washington, under cause number 98-1-03523-1, dated on or about November 20, 1998; and
- c) *Kidnapping in the Second Degree*, in King County Superior Court, Washington, under cause number 98-1-03525-7, dated on or about November 20, 1998.

Interstate Nexus Examination of the Firearm

14. ATF Special Agent David Cline has received specialized training in recognizing and identifying specific types of firearms, as well as identifying the location where a firearm was manufactured.

15. On February 28, 2018, SA Cline physically examined one Springfield, model XDm, 9mm caliber pistol with serial number MG854418 (Exhibit 1); and one 9mm caliber cartridge with a headstamp of "• SPEER • 9mm LUGER" (Exhibit 2). Exhibit 2 was the round of ammunition recovered from SADLER's pocket.

1 16. Based upon the examination of the firearm and the ammunition's
2 headstamp, in conjunction with his research, knowledge and experience, it is SA Cline's
3 opinion that Exhibit 1 was manufactured by HS Produkt in Croatia and imported into the
4 USA by Springfield, Inc. in Illinois; and that Exhibit 2 was manufactured by Cascade
5 Cartridge, Inc. (CCI) in Idaho.

6 17. SA Cline concluded that Exhibit 1 is a firearm as defined in Title 18,
7 U.S.C., Chapter 44, Section 921(a)(3) and was not manufactured in the State of
8 Washington. SA Cline further concluded that Exhibit 2 is ammunition as defined in Title
9 18, U.S.C., Chapter 44, Section 921(a)(17)(a), and was not manufactured in the State of
10 Washington.

11 18. It is the opinion of SA Cline the above-listed firearm and ammunition must
12 have traveled in and thereby affected interstate and/or foreign commerce if they were
13 received and/or possessed in the State of Washington.

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //


Conclusion

19. Based on the aforementioned facts, there is probable cause to believe that JASON SADLER committed the crimes of being a *Felon in Possession of a Firearm* and a *Felon in Possession of Ammunition*, each in violation of Title 18, United States Code, Section 922(g)(1).


Angelo Salcepuedes, Complainant
Special Agent, ATF

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing Affidavit on the 9th day of March, 2018. Based on that statement, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 9th day of March, 2018.


HON. BRIAN A. TSUCHIDA
Chief United States Magistrate Judge